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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

12 JOHN DOE,) Case No. 25-03140 JSW
13 Plaintiff,)
14 v.) **STIPULATION TO EXTEND TIME TO ALLOW**
15 DONALD J. TRUMP, in his official capacity as) **THE PARTIES TO ENGAGE IN**
16 President of the United States of America, *et al.*,) **NEGOTIATIONS FOR A POTENTIAL**
17 Defendants) **RESOLUTION; [PROPOSED] ORDER**
18 S.Y., *et al.*,)
19 Plaintiff,) Case No. 4:25-cv-3244-JSW
20 v.)
21 KRISTI NOEM, in her official capacity as)
22 Secretary of the United States Department of)
23 Homeland Security, *et al.*,)
24 Defendants)
25 ZHOUER CHEN, *et al.*,) Case No. 4: 25-cv-3292-JSW
26 Plaintiff,)
27 v.)
28)

STIPULATION
4:25-CV-03140 JSW and related cases

1 KRISTI NOEM, *et al.*,)
2 Defendants)
3 _____)
4 SHANGSHANG WANG,) Case No. 4:25-cv-3323-JSW
5)
6 Plaintiff,)
7 v.)
8 KRISTI NOEM, *et al.*,)
9 Defendants)
10 _____)
11 JUNGWON KIM, *et al.*,) Case No. 4:25-cv-3383-JSW
12 Plaintiff,)
13 v.)
14 KRISTI NOEM, *et al.*,)
15 Defendants)
16 _____)
17 W.B.) Case No. 4:25-cv-3407-JSW
18 Plaintiff,)
19 v.)
20 KRISTI NOEM, *et al.*,)
21 Defendants)
22 _____) Case No. 4:25-cv-3475-JSW
23 SKY QUI,)
24 Plaintiff,)
25 v.)
26 TODD M. LYONS, in his official capacity as)
27 Acting Director of United States Immigration an)
28 Customs Enforcement,)
Defendant.)
)

STIPULATION
4:25-CV-03140 JSW and related cases

EMMA BAI,) Case No. 4:25-cv-3481-JSW

Plaintiff,

V.

KRISTI NOEM, *et al.*,

Defendants

J.C. *et al.*,

Plaintiff,

V.

KRISTI NOEM, *et al.*,

Defendants.

ARYAN SHAH, *et al.*,

Plaintiff,

V.

TODD M. LYONS,

Defendant.

YIWEI HE,

Plaintiff,

V.

KRISTI NOEM, *et al.*,

Defendants.

1 On May 6, 2025, the Court granted the parties stipulation to an extension of time for Defendants' 2 supplemental opposition to Plaintiffs' motion for preliminary injunction, setting the deadline for 3 Defendants' opposition on May 7, 2025, at 5:00 p.m. *See* Dkt. No. 55. The Court noted that "[t]here 4 shall be no further extensions." *Id.*

5 Following the Court's order, Plaintiffs and Defendants have been actively engaged in 6 negotiations for a potential resolution of these cases. The parties are negotiating in good faith but will 7 need a brief period of additional time to determine if they can reach an agreement. Accordingly, the 8 parties respectfully request the Court to grant an extension of time for Defendants' supplemental 9 opposition to Plaintiffs' motions for preliminary injunction, and set the due date for Defendants' 10 opposition to May 8, 2025, at 5:00 p.m. The parties are mindful of the Court's order and make this 11 request because they believe it will benefit the parties and conserve the Court's resources to allow a 12 brief period of additional time for the parties to pursue a potential resolution.

13 For *He v. Noem*, No. 4:25-cv-3480-JSW, the parties request that the Court set the due date for 14 their joint status report to May 8, 2025. The parties respectfully request that the Court grant their 15 stipulation.

16
17 Dated: May 7, 2025

Respectfully submitted,

18
19 PATRICK D. ROBBINS
Acting United States Attorney

20
21 s/ Elizabeth D Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney

22
23 *Attorneys for Defendants*

Dated: May 7, 2025

24
25 s/ John Nicholas Sinodis
JOHN NICHOLAS SINODIS
Van Der Hout, LLP

26
27 *Attorney for Plaintiffs*

1 *s/ Andre Y. Bates*
2 ANDRE Y. BATES
3 DeHeng Law Offices PC

4 *Attorney for Plaintiff*

5 *s/ Jesse M. Bless*
6 JESSE M. BLESS
7 Bless Litigation

8 *Attorney for Plaintiff*

9 *s/ Brad Banias*
10 BRAD BANIAS
11 Banias Law

12 *Attorney for Plaintiff*

13 *s/ Ben Loveman*
14 BEN LOVEMAN
15 Reeves Immigration Law Group

16 *Attorney for Plaintiff*

17 *s/ Zachary R. New*
18 ZACHARY R. NEW
19 Joseph and Hall P.C.

20 *Attorney for Plaintiff*

22 **[PROPOSED] ORDER**

23 Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants will file their supplemental
24 opposition to Plaintiffs' motion for preliminary injunction by May 8, 2025, at 5:00 p.m.

26 Date:

27 JEFFREY S. WHITE
28 United States District Judge